

United States District Court
STATE AND DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

V.

(01) CORINTHIAN JOHNN REESE
(02) GLENN EVERETT GRADDY
(03) NICOLE RENEE MCDANIEL

CRIMINAL COMPLAINT

Case Number:

MS-11-308-JJK

I, Kylie M. Williamson, the undersigned complainant, being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about May 21, 2011, in Ramsey County, in the State and District of Minnesota, the defendant(s), each aiding and abetting the other, did knowingly and intentionally take property belonging to the Pot O'Gold Bingo Hall, a business engaged in interstate commerce, specifically United States currency, from and in the presence of Pot O' Gold employees, against their will, by means of actual and threatened force, and by means of violence and fear of immediate injury to their persons, including through the use and possession of a firearm during and in relation to the robbery,

in violation of Title 18 United States Code, Sections 2, 924(c), and 1951.

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

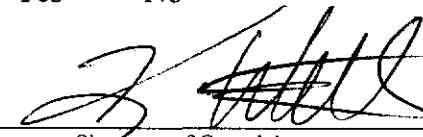
Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Sworn to before me, and subscribed in my presence,

7/27/11
Date

The Honorable Jeffrey J. Keyes
UNITED STATES MAGISTRATE JUDGE

Name & Title of Judicial Officer



Signature of Complainant
Kylie M. Williamson
Special Agent, ATF

St. Paul, MN
City and State

SCANNED

JUL 28 2011

U.S. DISTRICT COURT ST. PAUL



Signature of Judicial Officer

STATE OF MINNESOTA)
) ss. **AFFIDAVIT OF KYLIE M. WILLIAMSON**
COUNTY OF RAMSEY)

I, Kylie M. Williamson, being duly sworn, depose and state as follows:

1. I am a Special Agent with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and have been so employed since August of 2007. Prior to that, your Affiant was employed by ATF for two years as an Industry Operations Investigator. Your Affiant is currently assigned to the St. Paul Group I Field Office, and works with various law enforcement agencies and drug task forces throughout the state of Minnesota. Your Affiant's responsibilities include conducting criminal investigations of individuals and organizations related to the violations of Federal laws, particularly those found in Titles 18, 21, and 26. Your Affiant has participated in numerous investigations which have resulted in the arrests, searches, seizures, and convictions of individuals who have violated Federal law.

2. This Affidavit is submitted in support of a Complaint establishing probable cause to believe that on and within the subject camera, there is evidence of criminal activity, including of an armed robbery of the Pot O' Gold Bingo Hall located at 3776 Connelly Avenue in the City of Arden Hills, Minnesota, (hereinafter "Pot O' Gold").

3. The facts set forth in this Affidavit are based on my personal knowledge and observations in this investigation, on my review of police reports and surveillance video, and on discussions I have had with other law enforcement personnel directly involved in the investigation. The facts set forth herein contain information sufficient to support probable cause. This Affidavit is not intended to convey all of the facts learned during the course of this investigation.

4. On May 21, 2011, at just before 1:00 a.m., law enforcement officers responded to an armed robbery which had occurred at the Pot O' Gold Bingo Hall located at 3776 Connelly Avenue, Arden Hills, Minnesota. At the scene, the victims of the robbery reported that two black males entered the business and went to the main bingo hall, where one of the suspects pointed a black handgun at two employees. The suspect demanded money and the two employees complied, placing money into a white bag and handing it to the robber. Both suspects then fled through the main entrance of the business and ran toward Highway 51 across an embankment, an overgrown area with long grass and weeds.

5. The Pot O' Gold bingo hall is associated with St. Katherine Ukrainian Orthodox Church and, in addition to administering bingo games, sells gambling tickets commonly referred to as "Pull-Tabs."

The money taken by the robbers was primarily taken from the funds related to the purchase and redemption of Pull-Tabs.

6. Law enforcement officers obtained a description of the suspect getaway vehicle. A short time after the robbery, a law enforcement officer responding to the scene observed a vehicle matching the description on the on-ramp to eastbound 694 from northbound Lexington Avenue.

7. Officers stopped the vehicle, which was occupied by Reese, Graddy, McDaniel, and Antonio Johnson.

8. Law enforcement officers transported the two employees referenced above to the scene of the traffic stop. Both employees positively identified Reese and Graddy as the individuals who had entered the Pot O' Gold, with Reese identified as the one who had brandished the firearm.

9. Law enforcement officers obtained a search warrant for the suspect vehicle, and recovered, among other items, a white, plastic bag. Inside of the white bag, investigators located a large amount of US currency.

10. Law enforcement officers also searched the overgrown embankment where witnesses had observed the suspects running to the vehicle. There, Deputies located loose US currency in the weeds between the Pot O' Gold and the area where the suspects had entered the white SUV. In addition, lying on the shoulder of the road,

deputies recovered a bundle of one dollar bills, bound together. During a subsequent search of the embankment on May 23, 2011, law enforcement officers located a handgun, which matched the description of the gun provided by witnesses.

11. The total amount of the US currency recovered from the suspect vehicle and from along the path which suspects fled down the embankment was \$3,458.00.

12. Your Affiant has determined that the Pot O' Gold orders and operates a variety of games that were both manufactured and ordered from outside the State of Minnesota to include the seven pull-tab games that were operating on the night of the robbery. The employees further advised that the seven games that were in operation during the night of the robbery were not put back in play for approximately one week following the robbery. Consequently, the robbery of the Pot O' Gold resulted in an obstruction or delay in commerce, and in the movement of an article or commodity in commerce.

13. Based on my training, experience and participation in this and other investigations, I believe probable cause exists that Corinthian Johnn Reese, Glenn Everett Graddy, Nicole Renee McDaniel, and others known and unknown, aiding and abetting each other, committed an armed robbery of the Pot O' Gold Bingo Hall, in violation of Title 18, United States Code, Sections 2, 1951(a), and 924(c).

Further your Affiant sayeth not.


KYLIE M. WILLIAMSON
SPECIAL AGENT, ATF

SUBSCRIBED and SWORN to before me

this 17th day of July, 2011


The Honorable Jeffrey J. Keyes
United States Magistrate Judge